19CN-CC00009

IN THE CIRCUIT COURT OF CLINTON COUNTY MISSOURI

SHERITTA LAMBERT,)
Plaintiff,)
) Case No.:
VS.)
) JURY TRIAL DEMANDED
FIRST ADVANTAGE BACKGROUND)
SERVICES CORP.)
Registered Agent:	
CSC-Lawyers Incorp. Service Co.)
221 Bolivar Street	
Jefferson City, MO 65101	
)
Defendant.)

PETITION

COMES NOW the Plaintiff, Sheritta Lambert, and brings the following class action against Defendant, First Advantage Background Services Corp., ("Defendant"), pursuant to the Fair Credit Reporting Act ("FCRA").

PRELIMINARY STATEMENTS

- Defendant is a consumer reporting agency (as a "consumer reporting agency" is defined pursuant to the FCRA).
- Defendant provided consumer reports concerning the Plaintiff to USB Corporate
 Trust ("USB") and Quest Diagnostics Incorporated ("Quest").
- Defendant provided a consumer report concerning the Plaintiff to USB in or about June 2018.
- Defendant provided a consumer report concerning the Plaintiff to Quest in or about July 2018.
- 5. The Consumer Report provided to USB includes a Rapsheet Adjudication.
- 6. The Rapsheet Adjudication includes information that violates 15 U.S.C. 1681c.

- The Rapsheet Adjudication includes information from 2006 that should not be included in Plaintiff's Consumer Report.
- 8. The Consumer Report provided to Quest includes a section titled County Seat Felony & Misdemeanor.
- 9. Contained within the section titled County Seat Felony & Misdemeanor is information that is not a misdemeanor or a felony.
- 10. Plaintiff brings this action against Defendant for violations of the FCRA.
- 11. Plaintiff seeks statutory damages, actual damages, injunctive relief, punitive damages, costs and attorneys' fees, and other appropriate relief pursuant to the FCRA.

PARTIES

- 12. Plaintiff Lambert is a resident of Kansas City, Missouri.
- 13. Defendant is a foreign company doing business in Missouri.

JURISDICTION AND VENUE

- 14. This court has jurisdiction over Plaintiff's FCRA claim pursuant to 15 U.S.C. § 1681p and Article V, Section 14(a) of the Constitution of Missouri.
- 15. Venue is proper in this Court pursuant to R.S.Mo. 508.010.2(4).

FACTUAL ALLEGATIONS

- 16. The Consumer Report provided to Quest contains information that makes it appear as if the Plaintiff has misdemeanor and/or felony charges she does not.
- 17. The Consumer Report provided to Quest classifies an ordinance violation as a Felony or Misdemeanor.

- 18. The ordinance violation referenced in Defendant's Consumer Report is not a Felony or a Misdemeanor.
- 19. Defendant's classification of an ordinance violation as a Felony or Misdemeanor injured the Plaintiff.
- 20. On information and belief, Quest relied on Defendant's Consumer Report for employment purposes.
- 21. On information and belief, Quest relied on Defendant's Consumer Report and took adverse action against the Plaintiff that was based, in whole or in part, on information in the Consumer Report.
- 22. The Consumer Report provided to USB includes information via a Rapsheet Adjudication that violates the FCRA.
- 23. The Rapsheet Adjudication includes information about charges that have been dismissed.
- 24. The Rapsheet Adjudication includes information about charges that have been Nolle Prosequi.
- 25. The Rapsheet Adjudication includes information about cases that are closed.
- 26. Defendant included items of adverse information in Plaintiff's Consumer Report that are not conviction that antedate the report by more than seven years.
- 27. On information and belief, USB relied on Defendant's Consumer Report for employment purposes.
- 28. On information and belief, USB relied on Defendant's Consumer Report and took adverse action against the Plaintiff that was based, in whole or in part, on information in the Consumer Report.

- 29. The Consumer Report provided by the Defendant to USB and Quest were inaccurate and materially misleading.
- 30. The Consumer Report provided by the Defendant to USB and Quest were relied upon for employment purposes and heightened the risk of injury to the Plaintiff.
- 31. On information and belief, the Defendant attempted to comply with 15 U.S.C. 1681k in its Consumer Report production to Quest via 1681k(a)(2) and not 1681k(a)(1).
- 32. On information and belief, the Defendant attempted to comply with 15 U.S.C. 1681k in its Consumer Report production to USB via 1681k(a)(2) and not 1681k(a)(1).
- 33. Defendant is aware of the FCRA.
- 34. Defendant expects that the consumer reports they provide will be relied upon to make decisions regarding employment
- 35. Defendant has knowledge that it must comply with the FCRA.
- 36. Defendant is required to prepare all consumer reports in accordance with the FCRA.
- 37. Defendant's multiple violations of the FCRA combined with its knowledge of the requirements of the FCRA is evidence that the Defendant's violations were willful.

CLASS ACTION ALLEGATIONS

- 38. Plaintiff incorporates the foregoing paragraphs as if fully set forth herein.
- 39. Plaintiff asserts the following classes:
 - **1681e(b) Ordinance Class:** All individuals who were the subject of one or more consumer reports in which Defendant included information regarding an alleged

ordinance violation but identified it in a misdemeanor or felony section from February 19, 2019, through the conclusion of this matter.

1681c: All individuals who were the subject of one or more consumer reports in which Defendant included a Rapsheet Adjudication that included information that was not a record of conviction that antedated the report by more than seven years from February 19, 2019, through the conclusion of this matter.

Numerosity

40. The proposed class is so numerous that joinder of all class members is impracticable. Defendant regularly produces consumer reports on individuals to third parties. Defendant fails to follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the reports relate and fails to exclude adverse items of information, other than records of convictions, from reports in compliance with the FCRA. Plaintiff believes that during the relevant time period, a sufficient number of individuals would fall within the definition of the Putative Class.

Common Questions of Law and Fact

- 41. Virtually all of the issues of law and fact in this class action predominate over any questions affecting individual class members. Among the questions of law and fact common to the class is:
 - a. Whether Defendant complies with 1681c and follows reasonable procedures to assure maximum accuracy of the information contained in their reports;
 - b. Whether Defendant's violations of the FCRA were willful;
 - c. The proper measure of statutory damages and punitive damages; and

Typicality

42. Plaintiff's claims are typical of the members of the proposed class. Defendant is

a consumer reporting agency that produces consumer reports to third parties. Defendant produces the reports in violation of the mandates of the FCRA. The FCRA violations suffered by the Plaintiff are typical of those suffered by other class members and the Defendant treated Plaintiff consistent with other Putative Class members in accordance with its standard policies and practices.

Adequacy of Representation

43. Plaintiff, as a representative of the class, will fairly and adequately protect the interests of the Putative Class and has no interest that conflict with or are antagonistic to the interest of the class members. Plaintiff has retained attorneys competent and experienced in class action litigation. No conflict exists between Plaintiff and members of the class. A class action is superior to any other available method for the fair and efficient adjudication this controversy, and common questions of law and fact overwhelmingly predominate over individual questions that may arise.

Superiority

- 44. This case is maintainable as a class action under Fed. R. Civ. P. 52(b)(1) because prosecution of actions by or against individual members of the Putative Classes would result in inconsistent or varying adjudications and create the risk of incompatible standards of conduct for Defendant. Further, adjudication of each individual class members' claim as a separate action will potentially be dispositive of the interest of other individuals not a party to such action, impeding their ability to protect their interests.
- 45. This case is maintainable as a class action under Fed. R. Civ. P. 52(b)(2) because

- Defendant has acted or refused to act on grounds that apply generally to the Putative Classes, so that declaratory and/or injunctive relief is appropriate respecting the Classes as a whole.
- 46. Class certification is also appropriate under Fed. R. Civ. P. 52(b)(3) because questions of law and fact common to the Putative Classes predominate over any questions affecting only individual members of the Putative Classes, and because a class action is superior to other methods for the fair and efficient adjudication of this litigation. Defendant's conduct described in this Complaint stems from common and uniform policies and practices, resulting in common violations of the FCRA. Members of the Putative Classes do not have an interest in pursuing separate actions against Defendant, as the amount of each class member's individual claims is small compared to the expense and burden of individual prosecution. Class certification will also obviate the need for unduly duplicative litigation that might result in inconsistent judgments concerning Defendant's practices. Moreover, management of this action as a class action will not present any likely difficulties. In the interests of justice and judicial efficiencies, it would be desirable to concentrate the litigation of all Putative Class members' claims in a single forum.
- 47. Plaintiff intends to send notice to all members of the Putative Classes to the extent required by Rule 52. The names and address of the Putative Class members are available from Defendant's records.

VIOLATIONS OF THE FCRA

48. Plaintiff incorporates the foregoing paragraphs as if fully set forth herein.

- 49. Defendant utilizes a system that does not verify all records involving alleged criminal charges before producing a consumer report.
- 50. Defendant utilizes a system that does not exclude adverse items of information, other than records of convictions of crimes, that antedate the report by more than seven years in violation of the FCRA.
- 51. Defendant violated the FCRA by failing to follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.
- 52. Defendant's actions were negligent, reckless, and willful.
- 53. Defendant's violations were willful. Defendant acted in deliberate or reckless disregard of its obligations and rights of Plaintiff under the provisions of the FCRA. Defendant's willful conduct is reflected by, among other things, the following facts:
 - a. Defendant has access to legal advice; and
 - b. Defendant produced a consumer report on the Plaintiff that contained information that was misleading, inaccurate, incomplete, not up to date, and obsolete.
 - c. Defendant produced a consumer report that contained information that was not prepared in a manner that it would assure the maximum accuracy of the information being provided regarding the Plaintiff;
 - d. Defendant produced a Consumer Report on the Plaintiff that contained information that antedated the report by more than seven years in violation of 1681c; and
 - e. Defendant failed to abide by the FCRA.
- 54. Plaintiff is entitled to statutory damages of not less than \$100 and not more than \$1000 for each and every one of these violations, pursuant to 15 U.S.C.

§1681n(a)(1)(A).

- 55. Plaintiff is also entitled to punitive damages for these violations, pursuant to 15 U.S.C. §1681n(a)(2).
- 56. Plaintiff is further entitled to recover their costs and attorneys' fees, pursuant to 15 U.S.C. §1681n(a)(3).

WHEREFORE, the Plaintiff respectfully requests that this Court issue an Order for the following:

- a. Order finding that Defendant committed multiple, separate violations of the FCRA;
- Order finding that Defendant acted negligently and/or willfully in deliberate or reckless disregard of Plaintiff's rights and its obligations of the FCRA;
- Order awarding statutory damages and punitive damages as provided the FCRA;
- d. Order awarding reasonable attorneys' fees and costs as provided by the FCRA; and
- e. Order granting injunctive relief and other and further relief, in law or equity, as this Court may deem appropriate and just.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all causes of action and claims with respect to which Plaintiff has a right to jury trial.

By: <u>/s/ C. Jason Brown</u> Charles Jason Brown MO 49952 Jayson A. Watkins MO 61434 Brown & Watkins LLC 301 S. US 169 Hwy

Gower Missouri 64454 Tel: 816-424-1390 Fax: 816-424-1337

brown@brownandwatkins.com watkins@brownandwatkins.com ATTORNEYS FOR PLAINTIFF

19CN-CC00009

IN THE CIRCUIT COURT OF CLINTON COUNTY MISSOURI

SHERITTA LAMBERT, Individually And On Behalf Of)	
All Others,)	
Plaintiffs,)))	Case No.:
vs.)	
FIRST ADVANTAGE BACKGROUND)	
SERVICES CORP.,)	
Defendant.)	

ENTRY OF APPEARANCE

COMES NOW Jayson Watkins and hereby enters his appearance as counsel of record for Plaintiff and those similarly situated in the above captioned matter.

Respectfully submitted,

By: /s/ Jayson A. Watkins Jayson A. Watkins MO #61434 Brown & Watkins LLC 301 S. US 169 Hwy Gower Missouri 64454 Tel: 816-424-1390

Fax: 816-424-1337 watkins@brownandwatkins.com ATTORNEY FOR PLAINTIFF



IN THE 43RD JUDICIAL CIRCUIT, CLINTON COUNTY, MISSOURI

idge or Division:		Case Number: 19CN-CC00009	1	
BRENT ELLIOTT				
aintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ad	dress	
HERITTA LAMBERT		CHARLES JASON BROWN	15	
		301 S US HIGHWAY 169	II.	
	VS			FEB 2 0 2010
efendant/Respondent:		Court Address:	Clerk	FEB 2 0 2019
IRST ADVANTAGE BAC	KGROUND	207 NORTH MAIN		of Clinton Co. Circuit Court
ERVICES CORP.		PLATTSBURG, MO 64477		out Court
ature of Suit:	-A:			(Data Filo Stamp)
C Other Miscellaneous A		ummons in Civil Case		(Date File Stamp)
The State of Missouri to		GE BACKGROUND SERVICES CO	RP.	
ille State of Missouri to	Alias:	GE BAGNONOGNE GENTIGEG GG		
OCSC-LAWYERS INCORP				
21 BOLIVAR STREET				
EFFERSON CITY, MO 65101 COURT SEAL OF	Vou are summon	ned to appear before this court and	i to file your plea	ding to the petition.
OURT OR	conv of which is	attached, and to serve a copy of y	our pleading upo	on the attorney for
	nlaintiff/netitione	er at the above address all within 3	0 davs after rece	iving this summons.
(3)	exclusive of the	day of service. If you fail to file you	ır pleading, iudgi	ment by default may
(3)(18)	be taken against	you for the relief demanded in the	petition.	•
) i	you for the relief demanded in the	LIS DOCKRAY	/
CLINTON COUNTY	10016	(Circui	it Clerk & Reco	der .
	Da	te by in	me firkar	DOOD
			\sim \sim \sim	- Capus
	Further Information:		`	
		Sheriff's or Server's Return		
Note to serving officer:		Sheriff's or Server's Return eturned to the court within 30 days after the	ne date of issue.	
	Summons should be re	eturned to the court within 30 days after th	ne date of issue.	
I certify that I have serve	Summons should be red the above summons and a conv	eturned to the court within 30 days after the court within 30 days after the court (check one) of the petition to the defendant/responder	ent.	
I certify that I have serve	Summons should be red the above summons and a copy	eturned to the court within 30 days after the court within 30 days after the court (check one) y of the petition to the defendant/respondent the petition at the dwelling place or usual	ent. al abode of the defer	ndant/respondent with
certify that I have served delivering a copy of the leaving a copy of the	Summons should be red the above summons be summons and a copy of summons and a copy of	eturned to the court within 30 days after the court of the court within 30 days after the court (check one) If of the petition to the defendant/respondent of the petition at the dwelling place or usual person of the defendant.	ent. al abode of the defer	ndant/respondent with family over the age of
certify that I have served delivering a copy of the leaving a copy of the	Summons should be red the above summons be summons and a copy of summons and a copy of nently resides with the	eturned to the court within 30 days after the cy: (check one) of the petition to the defendant/respondent of the petition at the dwelling place or usual approach, a person of the defendent/respondent.	ent. al abode of the defer dant's/respondent's	ndant/respondent with family over the age of
l certify that I have served delivering a copy of the leaving a copy of the service on a corporation. It is service on a corporation of the service on a corporation.	Summons should be red the above summons he summons and a copy of nently resides with the pration) delivering a copy	eturned to the court within 30 days after the court of the petition to the defendant/respondent of the petition at the dwelling place or usual approximation, a person of the defendent/respondent.	ent. al abode of the defer dant's/respondent's aplaint to:	ramily over the age of
l certify that I have served delivering a copy of the leaving a copy of the 15 years who permad (for service on a corporation)	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the defer dant's/respondent's aplaint to:	ramily over the age of
certify that I have served delivering a copy of the leaving a copy of the 15 years who perma (for service on a corporation) other:	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the defer dant's/respondent's aplaint to:	(title).
certify that I have served delivering a copy of the leaving a copy of the 15 years who permad (for service on a corporation other:	Summons should be red the above summons be summons and a copy of summons and a copy of nently resides with the pration) delivering a cop	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usual, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the defer dant's/respondent's aplaint to:	tamily over the age of (title)
certify that I have served delivering a copy of the leaving a copy of the 15 years who permad (for service on a corporation) other:	Summons should be red the above summons be summons and a copy of summons and a copy of nently resides with the pration) delivering a cop	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the defer dant's/respondent's aplaint to:	(title).
certify that I have served delivering a copy of the leaving a copy of the 15 years who permated (for service on a corporation of the served at	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usual, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the defer dant's/respondent's applaint to: (date) a	(title) (address) t (time).
certify that I have served delivering a copy of the leaving a copy of the 15 years who permated (for service on a corporation of the served at	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usual, a person of the defendent/respondent. by of the summons and a copy of the com (name)	ent. al abode of the deferdant's/respondent's applaint to:(date) a	(title) (address) t (time).
certify that I have served delivering a copy of the leaving a copy of the 15 years who permated (for service on a corporation of the served at	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name) City of St. Louis), MO, on	ent. al abode of the deferdant's/respondent's applaint to: (date) a Signature of Sheriff of the defermination of the set of the defermination of the set of the defermination of the set	(title). (address) t (time).
certify that I have served delivering a copy of the leaving a copy of the 15 years who permated (for service on a corporation of the served at	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)	ent. al abode of the deferdant's/respondent's applaint to: (date) a Signature of Sheriff of the defermination of the set of the defermination of the set of the defermination of the set	(title). (address) t (time).
certify that I have served delivering a copy of the leaving a copy of the service on a corporation of the service of the serv	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have served delivering a copy of the leaving a copy of the service on a corporation of the service of the serv	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responder f the petition at the dwelling place or usual a person of the defendant/respondent. by of the summons and a copy of the common (name) City of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the deferdant's/respondent's applaint to: (date) a Signature of Sheriff of the defermination of the set of the defermination of the set of the defermination of the set	(title)(address) t(time). or Server
certify that I have served delivering a copy of the leaving a copy of the leaving a copy of the service on a corporation of the service of t	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expire	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have served delivering a copy of the leaving a co	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expire	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have served delivering a copy of the leaving a co	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expire	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have serve delivering a copy of the leaving a copy of the service on a corputation of the service on a corp	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the foration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expires sle \$	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have served delivering a copy of the leaving a copy of the leaving a copy of the service on a corport of the service of the service on a corport of the service on a corport of the service on a corport of the s	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expired to the state of the state	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. oy of the summons and a copy of the com (name) City of St. Louis), MO, on a notary public if not served by an authorized to before me on Date	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server
certify that I have serve delivering a copy of the leaving a copy of the service on a corputation of the service on a corp	Summons should be red the above summons to e summons and a copy of summons and a copy of nently resides with the pration) delivering a copy (County/ e of Sheriff or Server Must be sworn before a Subscribed and sworn My commission expired to the state of the state	eturned to the court within 30 days after the cy: (check one) y of the petition to the defendant/responde f the petition at the dwelling place or usua, a person of the defendant/respondent. by of the summons and a copy of the com (name)(rither of St. Louis), MO, on a notary public if not served by an authorized to before me on	ent. al abode of the defer dant's/respondent's applaint to: (date) a Signature of Sheriff of the defer ed officer:(date)	(title)(address) t(time). or Server

AFFIDAVIT OF SERVICE

State of Missouri	County of Clinton	Circuit Court
Case Number: 19CN-CC00009		
Plaintiff/Petitioner: SHERITTA LAMBERT		
vs. Defendant/Respondent: FIRST ADVANTAGE BACKGROUN	ID SERVICES CORP.	
ROBERT S heing duly sworn	depose and say that on the 2	Advantage Background Services Corp., MO 65101 I, DAVID M. day of FB , 20/9 at in Civil Case; and Petition in accordance
X REGISTERED AGENT SERVICE:	By serving LAUREN SA for the above-named ent	ity.
() RECORDS CUSTODIAN SERVIC as		3
() CORPORATE SERVICE: By servi	ngfor the above-named en	tity.
() OTHER SERVICE: As described in		
() NON SERVICE: For the reason de-	tailed in the Comments below.	
COMMENTS:		
I certify that I have no interest in the a which this service was made.	ibove action, am of legal age and hav	ve proper authority in the jurisdiction in
	Told	Noseins
Subscribed and Sworn to before me of, by the a personally known to me.	on the day PROCESS ffiant who is PROCESS Appointed in	SERVER # PSL9 - 03SL n accordance with State Statutes
Patricia Male	HPS Proce	ss Service & Investigations
NOTARY PUBLIC PATRICIA D. ROBERTS	1669 Jeffer	
STATE OF MISSOURI-County of	Kansas Cit Cole (800) 796-9	y, MO 64108 559
Commission #12481691 My Commission Expires Dec. 4,	2020 Our Job Ser	rial Number: 2019002833

Copyright @ 1992-2019 Database Services, Inc. - Process Server's Toolbox V8.0h



Judge or Division:

IN THE 43RD JUDICIAL CIRCUIT, CLINTON COUNTY, MISSOURI

Judge or Division:	Case Number: 19CN-CC00009]
R BRENT ELLIOTT		
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address	
SHERITTA LAMBERT	CHARLES JASON BROWN	P
The state of the s	301 S US HIGHWAY 169	
VS.		FEB 2 0 2019
Defendant/Respondent:	GOWER, MO 64454-9116	FEB 2 0 2010
FIRST ADVANTAGE BACKGROUND	Court Address:	~ 0 2019 (U)
SERVICES CORP.	207 NORTH MAIN	of Clinton Co. O.
	PLATTSBURG, MO 64477	lerk of Clinton Co. Circuit Count
Nature of Suit:		
CC Other Miscellaneous Actions		(Date File Stamp)
Sur	nmons in Civil Case	, , , , , , , , , , , , , , , , , , ,
The State of Missouri to: FIRST ADVANTAGE	BACKGROUND SERVICES CORP.	
Alias:		
C/O CSC-LAWYERS INCORP SERVICE 221 BOLIVAR STREET		
JEFFERSON CITY, MO 65101		
	to appear before this court and to file your p	landing a sta
copy of which is at	tached, and to serve a copy of your pleading	leading to the petition, a
plaintiff/netitioner a	It the above address all within 30 days after re	upon the attorney for
exclusive of the day	of convice If you fail to file your pleasing :	eceiving this summons,
be taken against vo	y of service. If you fail to file your pleading, ju ou for the relief demanded in the petition.	agment by default may
So taken against ye	ELLIS DOCKF	247
CLINTON COUNTY 2 7		
Date Date	Circuit Clerk & Re	corder
Further left and the	Dura Planto	VD ()OD.
Further Information:	oriffin on Comunic Dat	- Separa
Note to serving officer: Summons should be return	eriff's or Server's Return ned to the court within 30 days after the date of issue.	
certify that I have served the above summons by:	led to the court within 30 days after the date of issue.	
delivering a convert the above summons by:	cneck one)	
delivering a copy of the summons and a copy of	the petition to the defendant/respondent.	-
icaving a copy of the suffittions and a copy of the	e petition at the dwelling place or usual abode of the de	efendant/respondent with
15 years who permanently resides with the defe	, a person of the defendant's/responder	nt's family over the age of
(for service on a corporation) delivering a copy of	f the summons and a conv of the complaint to:	. 1
LAUREN SHIPLEY	(name) designee of logistered	1 Agent (title).
☐ other:		(auc).
2 1721 POLIVAN ST TEGG	MC-NC-1101CH	*
Served at 221 BOLLYAN ST., JEFFE	201-110	(address)
in(County/City	of St. Louis), MO, on O 42119 (date	e) at <u> </u>
DAYID M. ROBERTS	Mesang	
Printed Name of Sheriff or Server	Signature of She	riff or Server
Must be sworn before a not	tary public if not served by an authorized officer:	
Subscribed and sworn to I	perfore me on 3 1 1 1 9	date).
(Seal)	12-4-20 Pet "1	111-
My commission expires:	10 Puxial	(alle)
	Date	y Public
Sheriff's Fees, if applicable	32	
Summons \$	PATRICIA J. I	
Non Est \$	Notary Public-	
Sheriff's Deputy Salary	STATE OF MISSOUR	County of Cole
Supplemental Surcharge \$ 10.00	Commission:	
Mileage \$(_	miles @ \$ per mile) My Commission Exp	pires Dec. 4, 2020
Total \$		
A copy of the summons and a copy of the petition mus	st be served on each defendant/respondent. For method	ods of service on all
classes of suits, see Supreme Court Rule 54.		

AFFIDAVIT OF SERVICE

State of Missouri	County of Clinton	Circuit Court
Case Number: 19CN-CC00009		
Plaintiff/Petitioner: SHERITTA LAMBERT		
vs. Defendant/Respondent: FIRST ADVANTAGE BACKGROUND) SERVICES CORP.	
2:(Sρ.m., executed service by deliwith state statutes in the manner mark		20/9 at se; and Petition in accordance
REGISTERED AGENT SERVICE: I	By serving LAULEN SAPLEY for the above-named entity.	
	:: By serving for the above-named entity.	
() CORPORATE SERVICE: By servin as	g for the above-named entity.	
() OTHER SERVICE: As described in		
() NON SERVICE: For the reason deta	illed in the Comments below.	
	X	
I certify that I have no interest in the at which this service was made.	pove action, am of legal age and have proper a	uthority in the jurisdiction in
	-11/	
	To Mose	ins
Subscribed and Sworn to before me or of, by the aff personally known to me.	the day PROCESS SERVER # Appointed in accordan	ce with State Statutes
Patricia Males	HPS Process Service	& Investigations
NOTARY PUBLIC PATRICIA D. ROBERTS	www.hpsprocess.com 1669 Jefferson	n
Notary Public-Notary Seal STATE OF MISSOURI-County of C	Kansas City, MO 6410	8
Commission #12481691 My Commission Expires Dec. 4, 2	15 May 1869. Ltd 30	~ 2010002022
Mil Commission Expires Dec. 4, 7	Jan Job John Mullipel	. 2013002033

Copyright © 1992-2019 Database Services, Inc. - Process Server's Toolbox V8.0h



Judge or Division:

IN THE 43RD JUDICIAL CIRCUIT, CLINTON COUNTY, MISSOURI

Judge or Division:		Case Number: 19CN-CC000	09	
R BRENT ELLIOTT			T. T.	
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/	/Address	
SHERITTA LAMBERT		CHARLES JASON BROWN	Address	Pn
0.490		301 S US HIGHWAY 169		户" L 厚 L
	VS.	GOWER, MO 64454-9116	4	FED O
Defendant/Respondent:		Court Address:		FEB 2 0 2019
FIRST ADVANTAGE BAC	KGROUND	207 NORTH MAIN	q	erk of Clinton
SERVICES CORP.		PLATTSBURG, MO 64477		erk of Clinton Co. Circuit Count
Nature of Suit:				- out
CC Other Miscellaneous A	ctions			(Date File Stamp)
The Other Cast	Sur	nmons in Civil Case		
i ne State of Missouri to	: FIRST ADVANTAGE	BACKGROUND SERVICES	CORP.	
C/O CSC-LAWYERS INCORP S	Alias:			
221 BOLIVAR STREET	DEIGNOL			
JEFFERSON CITY, MO 65101				
COURT SEAL OF	You are summoned	to appear before this court a	ind to file your pl	eading to the petition, a
	copy of which is at	ached, and to serve a copy of	f your pleading i	inon the attorney for
(3)	evolucive of the de	t the above address all within	1 30 days after re	ceiving this summons,
(3)(3)(3)	be taken against vo	of service. If you fail to file you for the relief demanded in t	our pleading, jud	dgment by default may
	\ \	a for the rener demanded in	ELLIS DOCKR	AV
CLINTON COUNTY	2170/10			
	Date	No.	cuit Clerk & Red	corder
50550/URBANI	Further Information:	DV 1	milia	2 Uput
N-2-2	Sh	eriff's or Server's Return		
Note to serving officer:	Summons should be retur	ned to the court within 30 days after	r the date of issue.	
delivering and served	I the above summons by:	check one)		
leaving a copy of the	e summons and a copy of	the petition to the defendant/respon	ndent.	_
		petition at the dwelling place or us a person of the def	sual abode of the de	fendant/respondent with
15 years who permar	nently resides with the def	endant/respondent		ts failing over the age of
(for service on a corpo	ration) delivering a copy of	f the summons and a copy of the co	omplaint to:	1 - +
other:	FILLY	(name) <u>designee</u> o	1 (Cogistered	Agen) (title).
des chies w				<u> </u>
	IVAN ST. JEFA		(0)	(address)
in <u>COLE</u>	(County/City	of St. Louis), MO, on O7/21	(date) at <u> </u>
DAY	ID M. ROBERTS	W/Z	asay (
	of Sheriff or Server		Signature of Sher	iff or Server
		ary public if not served by an author	10	With the control of t
(Seal)	Subscribed and sworn to	Delore me on) + 1 / ('	date).
	My commission expires:	12-4-70 C	dexial //	alos
		Date	Notan	Public
Sheriff's Fees, if applicable	9_			
Summons	\$		PATRICIA J. F	
Non Est	\$		Notary Public-N	
Sheriff's Deputy Salary Supplemental Surcharge	\$10.00	S	STATE OF MISSOUR Commission	-County of Cole
Mileage	\$ 10.00	miles @ \$ per mile)	My Commission Exp	
Total	\$	per mile)		MAN II MAN W
	a copy of the petition mus	t be served on each defendant/res	nondent For metho	ide of carries on all
classes of suits, see Supren	ne Court Rule 54.	55 doi:100 on each delendant/les	pondent. For metho	de di service dii all
	an - with - 3-911 - 2000-20 - 1-10 - 10 - 20 - 20 - 20			